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May 28, 2021

Via ECF

Hon. P. Kevin Castel
United States District Court Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Weddington v. Sentry Industries, Inc.*
Civil Action No.: 1:18-CV-10055
Our File No.: 336-1901

*Application
Granted.
SO ORDERED
J. Haworth
JSDT
6-2-21*

Dear Judge Castel,

This firm represents defendant Sentry Industries, Inc. ("Sentry") herein. I write to seek an extension of time within which to file Sentry's reply brief in further support of its summary judgment motion. The reply brief is currently due June 10, 2021; we are seeking an extension to June 18, 2021. Plaintiff's counsel does not consent to this request. See email correspondence attached hereto. OK

I promptly perused plaintiff's opposition papers a few hours after they were filed yesterday. While I respectfully do not believe plaintiff's arguments are well founded, the reply will require review of case law, significant analysis and consultation with my client. As stated to Mr. Tagle in my email of last evening seeking his consent to this extension, the request is based on my workload between now and June 10. Significant events that require my personal attention have been scheduled since your Honor approved my requested motion-briefing schedule, including two complete days out of the office attending product inspections with a client and expert who is traveling to New York from out-of-town. Additionally, I have a family event the entire weekend commencing the evening of June 4, 2021 that cannot be moved.

I note that the parties cooperated with respect to all requested extensions during the discovery period. Plaintiff has provided no explanation for the failure to consent to the requested extension of time notwithstanding that the brief extension would work no prejudice upon his client.

Hon. P. Kevin Castel
May 28, 2021
Page 2

Thank you very much for your Honor's time and attention to this matter.

Respectfully submitted,

/s/ Scott Haworth

Scott Haworth (SH-5890)
Haworth Barber & Gerstman, LLC

SH/mmm
Enclosure

From: Eugene Tagle <etagle@dashnerlaw.com>
Sent: Thursday, May 27, 2021 11:12 PM
To: Scott Haworth
Cc: Gracie Ibarra; Sanita Jankovska
Subject: Re: [External] Weddington
Attachments: image001.jpg

Mr. Haworth,

With respect, we do not consent to the extension of time.

Sincerely,

Eugene Tagle

On Thu, May 27, 2021, 4:12 PM Scott Haworth <Scott.Haworth@hbandglaw.com> wrote:

Mr. Tagle,

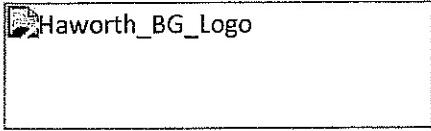
I have received and reviewed plaintiff's opposition to Sentry's summary judgment motion. Due to the size of the opposition, the issues raised and my current workload, I am requesting that you consent to an extension of time for submission of the reply brief to Friday, June 18. I would appreciate if you would promptly advise as we are currently working on a fairly tight deadline and I will need to write to Judge Castel tomorrow seeking the extension.

Thank you for your courtesies.

Regards,

Scott Haworth

Managing Partner

 Haworth_BG_Logo

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